

Exhibit D

April Brown

From: Rachael Lamkin [<mailto:rdl@lamkinipdefense.com>]
Sent: Tuesday, April 11, 2017 5:15 PM
To: Neal Massand <[nmasand@nilawfirm.com](mailto:nmassand@nilawfirm.com)>
Subject: Re: Let's talk

Appreciate the follow through either way.

And apologies for the 3 extension applications filed. I thought a motion was required for a second extension. Should be all set now.

On Tue, Apr 11, 2017 at 3:12 PM, Neal Massand <nmasand@nilawfirm.com> wrote:

I will let my client know of your thoughts but suspect he won't be interested.

On Apr 11, 2017 5:07 PM, Rachael Lamkin <rdl@lamkinipdefense.com> wrote:

Neal,

Attached please find the fees motion i mentioned yesterday, filed today in the RCDI case. The more i researched, the more widespread the conduct appears to be, and now i think all of Rothschild's cases may be filed under the same misrepresentations, and could potentially have to be refiled. At least if Judge Gilstrap adjudicates this motion.

I know you're focused on your case, but i suspect your client must take a broader view. I personally would like to see this motion adjudicated as i think it could result in important new law, but my client has a narrower view. Thus maybe we can horse-trade, your client agrees to dismiss Garmin, with prejudice, from your matter, and Garmin drops its motion in RCDI and forgoes any fees motion in this case.

I know this seems early and aggressive but i think here, the facts warrant this kind of quick compromise. Let me know if you want to discuss.

Best,

Rachael

Rachael Lamkin
Lamkin IP Defense
[916.747.6091](tel:916.747.6091)
<https://www.linkedin.com/in/rdlamkin/>

--
Best,

Rachael

Rachael Lamkin
Lamkin IP Defense
916.747.6091
<https://www.linkedin.com/in/rdlamkin/>